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Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 3-16-cr-00051-BR-15

v.

DEFENDANT'S MOTION TO CONTINUE TRIAL DATE

SANDRA LYNN ANDERSON,

Defendant.

Defendant Sandra Lynn Anderson through her counsel Tyl W. Bakker hereby moves for an order continuing the trial of her case, currently scheduled to commence on September 7, 2016 to March 1, 2017 or a date thereafter convenient to the Court. This motion is made on the grounds set forth in the Declaration of Counsel filed herewith. Ms. Anderson, who is out of custody, consents to the continuance of her trial. Assistant United States Attorney Craig Gabriel takes no position at this time. Assistant United States Attorney Craig Gabriel currently takes no position on this motion. He further states that the Government will take a position on this motion after the June 15th Status Conference.

Respectfully, submitted on May 16, 2016.

/s/ Tyl Bakker

Tyl W. Bakker, OSB #902000

Attorney for Defendant